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May 17, 2012

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street  
Washington, D.C. 20554

Re: *Telecommunications Carriers Eligible for Universal Service Support*, WC Docket  
No. 09-197; *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42

Dear Ms. Dortch:

On Wednesday, May 16, 2012, Lance Steinhart, John Nakahata, and Heather Kirby, on behalf of EZ REACH MOBILE, LLC ("EZ Reach"), as well as Bassam Abdallah, COO of EZ Reach, spoke with Divya Shenoy, Garnet Hanley and Jonathan Lechter of the Telecommunications Access Policy Division. We discussed EZ Reach's Compliance Plan as filed on May 1, 2012.

Bassam Abdallah gave an overview of his field experience and stated that while EZ Reach is a new company, it draws on the technical expertise of its management team, all members of which have been in the telecommunications industry for over a decade. We also discussed the financial capability of EZ Reach. We discussed specifically EZ Reach's marketing strategy which will focus on live events, as well as EZ Reach's enrollment process and procedures regarding fraud prevention. We also discussed EZ Reach's Certification form and suggested changes.

Finally, EZ Reach agreed to have all suggested changes made to its Certification form and Compliance Plan and to file a revised Compliance Plan and ETC Application.

Attached is a copy of the presentation deck that was provided at the meeting yesterday. Please contact me if you have any questions. Thank you.

Respectfully submitted,

/s/ LANCE STEINHART

Lance J.M. Steinhart  
Attorney for EZ REACH MOBILE, LLC

Ms. Marlene H. Dortch

May 17, 2012

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Attachments

cc: Bassam Abdallah  
John Nakahata  
Kimberly Scardino  
Divya Shenoy  
Garnet Hanley  
Jonathan Lechter

# EZ REACH MOBILE, LLC

Presentation  
before the  
Federal  
Communications  
Commission  
May 16, 2012



# Agenda



- **Introduction to EZ REACH MOBILE, LLC**
- **Financial Capability**
- **Technical Capability**
- **EZ REACH MOBILE Lifeline Plans**
- **Marketing & Advertising Plan**
- **Enrolling Lifeline Customers**
- **Recertifying Lifeline Customers**
- **Preventing Waste, Fraud & Abuse**
- **Q & A**

# EZ REACH MOBILE, LLC



- **Names and Identifiers:**

- **EZ REACH MOBILE, LLC**
- **EZ REACH MOBILE**
- **EZ REACH**

# EZ REACH MOBILE, LLC



- **In compliance with newly amended section 54.202, EZ REACH MOBILE certifies:**
  - **It will comply with the service requirements applicable to the support that it receives;**
  - **It has the ability to remain functional in emergency situations;**
  - **It will satisfy applicable consumer protection and service quality standards; and**
  - **It is financially and technically capable of providing the Lifeline service.**

# Financial Capability



- **EZ REACH MOBILE has the financial resources necessary to provide the supported Lifeline service**



# Technical Capability



- **EZ REACH MOBILE is technically capable of providing the supported Lifeline service :**
  - **Key Management Experience**
    - **Bassam Abdallah – 14 yrs in telecom**
    - **Raymond Abdallah**
    - **Rachelle Copeland**



# **EZ REACH MOBILE lifeline plans**



- **EZ REACH MOBILE proposes a choice between two (2) Lifeline plans:**
  - **100 Monthly Minutes**
  - **250 Monthly Minutes**
- **All plans include:**
  - **Free handset**
  - **Free calls to Customer Service**
  - **Free calls to 911 Emergency Services**
  - **Free Voicemail, Caller ID, and Call Waiting**
  - **Free Domestic Long Distance**

# EZ REACH MOBILE lifeline plans



PLAN	Free Monthly Minutes Included in Plan	Text Messaging Charge	Unused Minutes Carryover	Voice Mail Caller ID Call Waiting
1	250 minutes	Not Available	No	Yes
2	100 minutes	3 text / 1 min	90 days	Yes

## Additional bundles of minutes currently available:

\$5 = 75 minutes	\$13.50 = 250 minutes
\$25 = 500 minutes	\$30 = 1000 minutes

# EZ REACH MOBILE lifeline plans



- **Public Safety and 911 / E911 Access:**
  - **EZ REACH MOBILE will ensure that all handsets used in connection with its Lifeline service are E911-compliant.**
  - **EZ REACH MOBILE will provide its Lifeline customers with access to 911 and E911 services:**
    - **through its underlying carrier, Sprint**
    - **at the time of Lifeline service initiation**
    - **regardless of activation status and minute availability**

# Marketing & Advertising plan



- **All materials will :**
  - **Disclose company name under which it does business;**
  - **Explain in clear, easily understood language the following:**
    - **Only eligible consumer may enroll in the program;**
    - **The program is limited to one benefit per household, consisting of either wireline or wireless service;**
    - **Lifeline is a government benefit program;**
    - **What documentation is necessary for enrollment;**
    - **Consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.**

# Marketing & Advertising plan



## EZ REACH MOBILE

*an EZ way to stay connected*

- **EZ REACH MOBILE intends to market its Lifeline service via:**
  - **Direct Response Radio**
  - **Community Events**
  - **Internet**

# Enrolling lifeline customers



## Eligibility Confirmation:

1. **Confirm prospect's identity**  
(see government issued picture ID)
2. **Confirm program or income eligibility**  
(see proof)
3. **Confirm valid household address and whether permanent/temporary or multi-household**  
(validate w/USPS)
4. **Confirm prospect not currently receiving subsidy**  
(ask prospect, perform duplicate check into an internal and pooled external database)
5. **Confirm that eligible party has received the handset and has used it prior to seeking reimbursement**



# Enrolling lifeline customers



## End-User Education and Disclosures:

- Lifeline is a federal non-transferable benefit
- Lifeline service is available for only one line per household
- A household is defined, for Lifeline Program purposes, as any individual or group of individuals who live together at the same address and share income and expenses
- Households are NOT permitted to receive benefits from multiple providers
- Violation of the one per household limitation constitutes violation of the FCC's rules and will result in de-enrollment from the program, and potentially prosecution by the U.S. Government



# Enrolling lifeline customers



- **End User Attestations: See Certification Form**

## EZ REACH MOBILE

Georgia Application  
Questions? Please call 1-877-309-4629

<b>1. APPLICANT (PLEASE PRINT)</b>			
First Name:	Middle Initial:	Last Name:	
Social Security Number (or Tribal ID Number):		Date of Birth:	Month   Day   Year
Residence Address:		Apt:	City: State: Zip:
This address is: <input type="checkbox"/> permanent <input type="checkbox"/> temporary <input type="checkbox"/> multi-household			
Billing Address:		Apt:	City: State: Zip:
Contact Phone Number (Friend or relative):		Email (if available):	
<b>2. ELIGIBILITY REQUIREMENTS (PROGRAM-BASED - CHECK ALL THAT APPLY)</b>			
I HEREBY CERTIFY THAT I PARTICIPATE IN A MINIMUM OF ONE OF THE FOLLOWING ASSISTANCE PROGRAM(S):			
<input type="checkbox"/> National School Lunch Program's free lunch program	<input type="checkbox"/> Temporary Assistance for Needy Families (Work First)		
<input type="checkbox"/> Food Stamps - Supplemental Nutrition Assistance Program (SNAP)	<input type="checkbox"/> Supplemental Security Income (SSI)		
<input type="checkbox"/> Federal Public Housing (SECTION 8)	<input type="checkbox"/> Low Income Home Energy Assistance (LIHEAP)		
<input type="checkbox"/> [State Program]	<input type="checkbox"/> Medicaid		
<b>3. ELIGIBILITY REQUIREMENTS (INCOME-BASED)</b>			
<input type="checkbox"/> My household income is at or below 135% of the Federal Poverty Guidelines (FPG). There are _____ individuals in my household.			
<b>4. READ AND SIGN THE FOLLOWING:</b>			
I affirm, under penalty of perjury ( <i>check each certification</i> )			
<input type="checkbox"/> I am a current recipient of the above program, or have an annual household income at or below 135 percent of the FPG			
<input type="checkbox"/> I have provided documentation of eligibility if required			
<input type="checkbox"/> To the best of my knowledge, I and no one in my household is receiving a Lifeline supported service from any other land line or wireless company. I understand that I can only receive one Lifeline subsidy.			
<input type="checkbox"/> To the best of my knowledge, I and no one in my household is receiving a Lifeline supported service from any other land line or wireless company. I understand that I can only receive one Lifeline subsidy.			
<input type="checkbox"/> I understand Lifeline is non-transferable; I may not transfer my service to any individual, including an eligible low-income consumer			
<input type="checkbox"/> I understand that if my service goes unused for sixty (60) days, I will no longer be eligible for Lifeline benefits and my service will be suspended subject to a thirty (30) day period during which I may use the service or contact the Company to confirm that I want to continue receiving Lifeline service from the Company			
<input type="checkbox"/> I will notify EZ REACH within thirty (30) days if I no longer qualify for Lifeline. I understand I may be subject to penalties if I fail to notify my phone company. Specifically, I will notify my company if: (1) My household is receiving more than one Lifeline service, or (2) I cease to participate in the above federal or state program, or my annual household income exceeds 135% FPG			
<input type="checkbox"/> I will notify my phone company within thirty (30) days of moving. Additionally, if my address listed above is a temporary address, I understand that EZ REACH will contact me every ninety (90) days to re-verify my address; if I fail to respond to my telephone company's address verification attempts within thirty (30) days, I may be de-enrolled from my Lifeline service			
<input type="checkbox"/> My telephone company has explained the one-per household requirement, and I understand that violation of the one-per-household requirement constitutes a violation of the FCC's rules and will result in my de-enrollment from the lifeline program, and could result in criminal prosecution by the United States Government			
<input type="checkbox"/> My telephone company has explained to me that I am required each year to re-certify my continued eligibility for Lifeline at any time, and that if I fail to do so within thirty (30) days, it will result in the termination of my Lifeline benefit			
I understand that Lifeline is a federal benefit. I understand that Lifeline is only available for one line per household and a household cannot receive benefits from multiple providers. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses.			

I authorize EZ REACH MOBILE, LLC or its appointed representative to access any records or provide to state and Federal agencies, including the Universal Service Administrative Company (USAC) and/or its agents, my account information (including but not limited to my name, telephone number, date of birth, social security number, address, and usage history) required to verify my statements herein and to verify that I do not receive more than one Lifeline subsidy.

I understand that completion of this application does not constitute immediate approval for Lifeline.

☐ The foregoing representations are true and correct to the best of my knowledge. I acknowledge that willfully providing false or fraudulent information to receive Lifeline benefits is punishable by law and may result in me being barred from the program.

Applicant Signature

Date: \_\_\_\_\_ 20\_\_\_\_

Certification is good for one year from the date of signing.

**5. PLEASE RETURN APPLICATION TO:**

**By MAIL:**

EZ REACH MOBILE, LLC  
3957 PLEASANTDALE RD, STE 107  
ATLANTA GA 30340

Questions? Please call 1-877-309-4629

Complaints concerning Lifeline service can be directed to the Georgia Public Service Commission's Consumer Affairs Unit at 404-656-4501 or 1-800-282-5813.

**FOR OFFICE USE ONLY**

Company Representative:

Representative Signature:

Documentation Verified:

Date:

# Recertifying lifeline customers



- **EZ REACH MOBILE commits to re-certify the eligibility of all Lifeline customers (as of June 1, 2012) by the end of 2012 and report the results to USAC by January 31, 2013.**
- **EZ REACH MOBILE will continue to re-certify all active Lifeline customers by the annual anniversary of their enrollment.**
- **All customers who fail to respond to the annual certification request within 30 days will be given additional notice that they have 30 more days to respond. If there is still no response, they will be de-enrolled from the Lifeline program.**
- **In addition, EZ REACH MOBILE will continue to follow any state-specific requirements.**

# Preventing waste, fraud & abuse



- **EZ REACH MOBILE utilizes a diligent Enrollment Process**
- **EZ REACH MOBILE's business model primarily employs direct, high quality contact (at events or over the phone/internet)**
- **EZ REACH MOBILE emphasizes compliance in all aspects of the Lifeline program – marketing, enrollment procedures, representative training, process documentation, non-usage/de-enrollment procedures**
- **EZ REACH MOBILE will not seek reimbursement until a customer has personally activated service (by initiation and/or usage)**
- **60-day non-usage policy**

# Preventing waste, fraud & abuse



## **Additional Measures to prevent Waste, Fraud & Abuse:**

- **Duplicates Database**
  - **CGM, LLC**
  - **National Database, when in place**
- **Provide customer data to PUCs, FCC, and USAC**
- **Independent Biennial Audits\***
  - **\*if EZ REACH MOBILE draws \$5 million+ on an annual basis**

# EZ REACH MOBILE, LLC

Questions?

